

RCAP-RECEIVED

MAY 12 2011

Mr. Ken Herstowski
Project Manager
Air, RCRA and Toxics Division
United States Environmental Protection Agency
Region 7
901 North 5th Street
Kansas City, Kansas 66101

Subject:

Summary of Results - Pre-Development Investigation
Heritage Track Project
Union Pacific Railroad – Former Omaha Shops Site
Omaha, Nebraska
RCRA ID# NED000829754

Dear Mr. Herstowski:

This letter presents the results of sampling performed as part of a Pre-Development Investigation for the Union Pacific Railroad (UP) Heritage Track site, located north of Abbott Drive in Omaha, Nebraska. This soil and groundwater characterization was performed as part of the RCRA Corrective Measure Implementation (CMI) at the former UP Shops Facility in Omaha, Nebraska (herein referred to as the Site). All sample collection, laboratory analysis, and evaluation were consistent with the requirements contained in the Site-wide Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP) for the Site¹.

BACKGROUND

UP is constructing a spur track and display area for steam locomotives and heritage fleet passenger cars along the north side of Abbott Drive, as shown on Figure 1. This property on which the display spur is located is owned by UPRR and is within the boundary of Operable Unit No. 2 (OU2) of the 9th and Webster Street site, which is commonly referred to as the Former Omaha Shops site. Figure 2 shows the Heritage track project footprint in proximity to the soil monolith and embankment constructed during the Abbott Drive realignment.

¹ ARCADIS, 2008. Site-Wide Sampling and Analysis Plan and Site-Wide Quality Assurance Project Plan for Corrective Measures Implementation. Operable Units OU2 and OU3, Union Pacific Railroad, 9th and Webster Streets (Former Omaha Shops Site) Omaha, Nebraska, EPA ID No. NED000829754. ARCADIS, Lenexa, KS. April 22.

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KC001557.0001

Since the Heritage Track Project is being developed within the boundaries of OU2, the provisions of the OU2 CMI Work Plan² apply, and a Pre-Development Investigation was conducted to collect and evaluate soil data prior to construction.

The non-intrusive track construction activities, including sub-roadbed preparation, ballast installation, and track laying, are on-going through April and May 2011, with a completion date of early June 2011.

SUMMARY OF WORK PERFORMED

The scope of work for the Pre-Development Investigation was discussed in a letter to EPA dated February 17, 2011. This section presents the results of the investigation.

The Heritage Track spur is being built generally on-grade, but intrusive construction activities were performed at the location of a large City of Omaha storm sewer. The track crosses a 14 ft by 9 ft box storm sewer and nearby 15-inch sanitary sewer just north of 10th Street and Abbott Drive. In order to protect the sewer piping, a pile and slab structure was constructed over the lines. Soil borings were initially drilled, and cap piles installed in the soil borings. Once the four lines of cap piles were in place, three steel-reinforced, horizontal concrete slabs were cast-in-place over the storm and sanitary sewer lines. All soil removed during intrusive construction activities was stockpiled and sampled as further described below.

The Heritage Track project is classified as a non-residential development, with potential exposure scenarios including workers, construction workers, and recreational users. The OU2 CMI Work Plan outlines the investigative requirements prior to conducting non-residential development, and the soil cleanup levels to be maintained during development. The Pre-Development Investigation for the Heritage Track work was consistent with the requirements contained in the OU2 CMI Work Plan. The Heritage Track Pre-Development Investigation included:

- Reviewing previous data collected during the Former Omaha Shops RFI, in the vicinity of the Heritage Track Project
- Collecting shallow (0 to 1 ft below ground surface, bgs) soil samples along the track alignment and in proposed non-paved Heritage Train viewing areas

² ARCADIS, 2008. Operable Unit No. 2. Corrective Measures Implementation Work Plan. Union Pacific Railroad, 9th and Webster Streets (Former Omaha Shops Site) Omaha, Nebraska, EPA ID No. NED000829754. ARCADIS, Lenexa, KS. April 22.

- Collecting deep (up to 22 ft bgs) soil samples in the areas where storm sewer upgrades were planned
- Collecting groundwater samples in the areas where construction workers may potentially come into contact with groundwater.
- Removal of surface soil containing elevated arsenic samples and collection of confirmation samples following soil disposal.
- Collection of characterization samples from excavated soil accumulated from intrusive activities.

These activities and the results of sampling are discussed below.

REVIEW OF HISTORICAL RFI DATA

Figures 3, 4 and 5 present the results of soil sampling performed during the RFI in the vicinity of the Heritage Track project. The soil quality data summarized in these figures were reviewed and used to guide the Pre-Development Investigation sampling location and constituents to be analyzed. Figure 3 shows that the non-residential soil cleanup goal for lead (1,218 mg/kg) was exceeded in the surface (0-1 ft bgs) location at four locations:

- UPCA-SB15 (east of Izard and 11th Street);
- UPCA-SB14 (now beneath the monolith);
- UPNY-SB07 (north of the monolith and west of 8th Street Yard); and
- UPNY-SB14 (west of the 8th Street Yard and just south of Seward Street)

As part of the historical remediation work at OU1 Corrective Measures, soil from these four boring locations were excavated and placed in the Abbott Drive monolith.

SHALLOW AND SUBSURFACE SAMPLING

In March 2011, surface and subsurface soil samples and groundwater samples were collected according to the standard operating procedures for direct push sampling contained in the Site-Wide SAP prepared for OU2. Samples were analyzed for lead, arsenic, volatile organic chemicals (VOCs) and/or semi-volatile organic chemicals (SVOCs) as appropriate. Figures 6, 7, and 8 present the results of the sampling for lead and arsenic, VOCs/SVOCs, and groundwater VOCs, respectively. The laboratory reports for the Pre-Development sampling are presented in Attachment 1.

Surface soil sampling locations were chosen to obtain data along the proposed track alignment and in proposed non-paved viewing areas to include geographic coverage of the Heritage Track project. Surface samples were collected in the 0 to 1 ft below ground surface (bgs) interval.

All surface samples were analyzed for lead and arsenic. Additionally, four surface samples (SSB-07, SSB-10, SSB-12, and SSB-14) were analyzed for VOCs, and SVOCs. The sampling locations for the VOC/SVOC analysis were chosen to correspond to areas where those groups of constituents were detected during the RFI, as summarized in Figures 3, 4, and 5.

Subsurface soil and groundwater samples were collected at areas where construction workers could potentially be exposed to impacted subsurface soils, specifically:

- In the vicinity where the existing 9 ft x 14 ft box storm sewer line crosses the proposed track alignment, located north of the Abbott Drive/10th Street intersections. Two soil borings (DSB-01 and DSB-02) were installed at the box storm sewer. Soil samples were collected at the following depth from each of the soil borings:
 - 6 ft bgs;
 - 10 ft bgs;
 - 18 ft bgs (two feet below the invert elevation of the box storm sewer)

The subsurface box storm sewer samples were analyzed for lead, arsenic, VOCs, and SVOCs. Results for lead and arsenic are presented on Figure 6. VOC and SVOC results are presented on Figure 7. No groundwater was encountered at 18 ft bgs during sampling at the box culvert location.

Although not part of the Heritage Track project, a triple storm sewer line is scheduled to be extended through the site by the City of Omaha in 2012. In anticipation of this construction, three soil borings (DSB-3, DSB-4, and DSB-5) were installed along the proposed triple storm sewer corridor. At these locations, samples were collected at the 6 ft, 10 ft, and 22 ft bgs intervals. Groundwater was encountered at 22 ft bgs in these locations and thus, groundwater samples were collected.

The triple storm sewer corridor samples were analyzed for lead, arsenic, VOCs, and SVOCs, and the three groundwater samples were analyzed for VOCs. The groundwater sampling results are shown on Figure 8.

SURFACE SOIL REMOVAL AND CONFIRMATION SAMPLING

The results of the Pre-development Investigation sampling indicated that, with the exception of one location (SSB-07, see Figure 6), all samples at all locations were below the non-residential soil cleanup levels, as presented in the USEPA Corrective Measures Decision document³, and summarized in the OU2 CMI Work Plan.

Arsenic was detected in the 0 to 1 ft bgs sample SSB-07 at a concentration of 1,180 mg/kg, compared to a non-residential soil cleanup level of 440 mg/kg.

Since the arsenic cleanup level was exceeded at SSB-07, the soil at and around SSB-07 was excavated to a depth of 1 ft, and sent to Butler County Landfill under a special waste disposal permit. Approximately 23 cubic yards (a 25 ft by 25 ft square) of soil was excavated from around SSB-07 and disposed.

Following excavation, a composite confirmation sample was collected from the bottom of the excavated area and submitted for lead and arsenic analysis. The results are shown on Figure 6 and indicate that the 1 to 2 ft interval is below the non-residential soil cleanup goals for lead and arsenic. The laboratory reports for the SSB-07 confirmation sampling are presented in Attachment 2.

STOCKPILED SOIL SAMPLING

As part of the intrusive activities at the sewer near Abbott Drive and 10th Street, soil was excavated prior to installing piers to support protective caps over the sewer. The soil that was excavated was field-screened with a PID during excavation and all soil generated from the intrusive activities was stockpiled on-site. Once the intrusive activities were completed, a composite characterization sample was collected of the stockpiled soil and analyzed for lead, arsenic, VOCs and SVOCs. The results of the analysis on the stockpiled soil are presented in Attachment 3 and summarized below:

- Lead 61.6 mg/kg
- Arsenic 12.1 mg/kg
- VOCs none detected – J coded values only

³ USEPA, 2007. Response to Comments and Final Corrective Measures Decision. Corrective Measures for Operable Units Number 2 and 3 and Contingent Restricted Residential Corrective Measures for Operable Units 1, 2 and 3. Union Pacific Railroad 9th and Webster Streets, Omaha, Nebraska. RCRA ID# NED000829754

- SVOCs Fluoranthene – 0.137 mg/kg
 Phenanthrene – 0.0489 mg/kg,
 Pyrene - 0.122 mg/kg
 other constituents with J coded values

Since the analytical results for the stockpiled soil were well below the non-residential soil cleanup goals, and the lead result was also below the 200 mg/kg level for 'clean fill' as defined in the Corrective Measure Decision document, the stockpiled soil was reused as backfill. A portion of the stockpiled soil was used to bring the SSB-07 excavation back to its original grade, and the remainder used to fill low-lying areas. Both the SSB-07 area and the low-lying areas will be covered with imported clean fill to raise the surface to the final grade designed grade.


RECOMMENDATIONS AND ADDITIONAL ACTIVITIES

According to the construction plans, all significant intrusive activities have been completed at the site. Shallow excavations for light poles and fence posts will be installed in early May, and ARCADIS will be present to field-screen the excavation activities with a PID. No additional sampling is planned.

Please call us at 913.492.0900 if you have any questions regarding the enclosed information.

Sincerely,

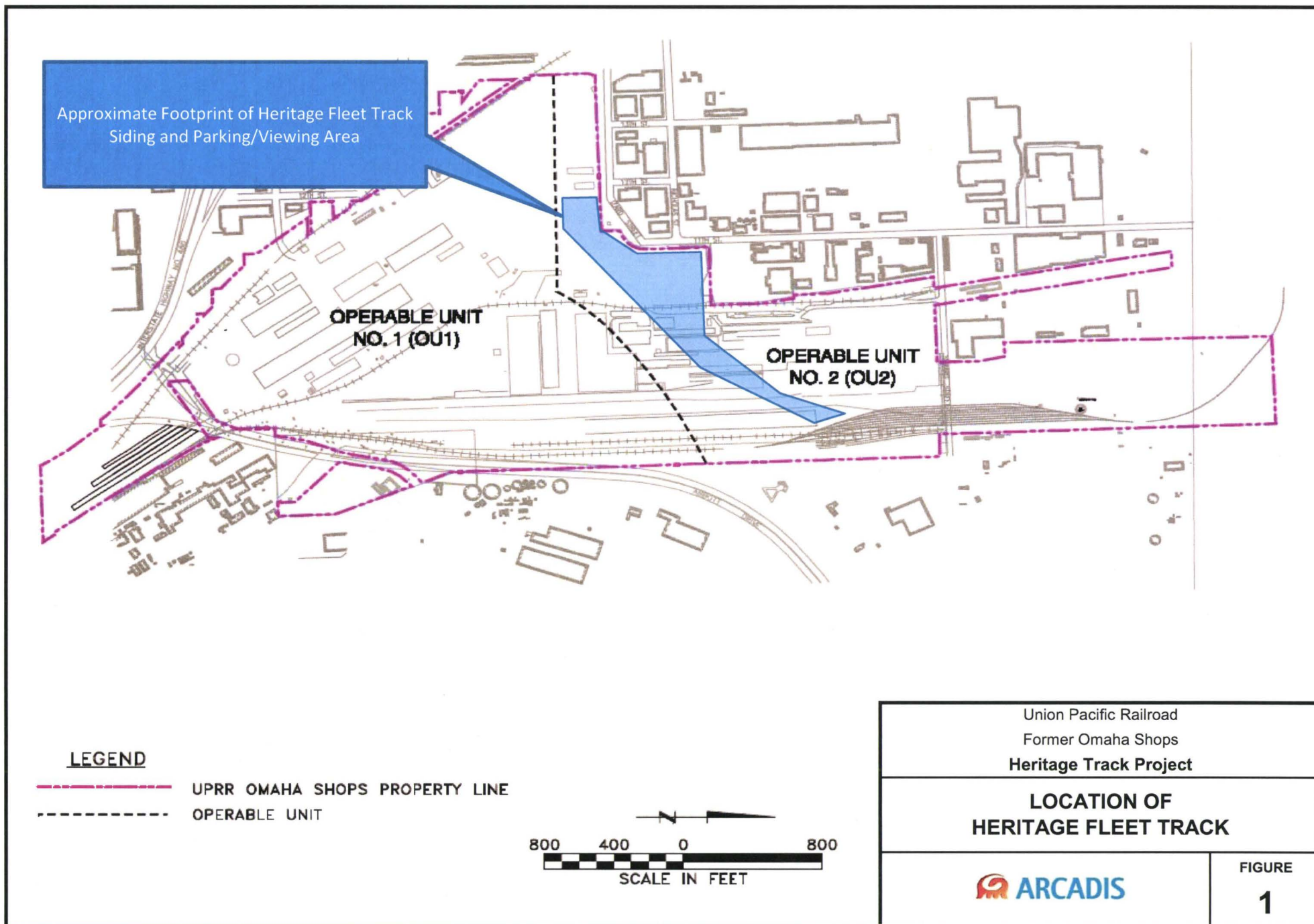
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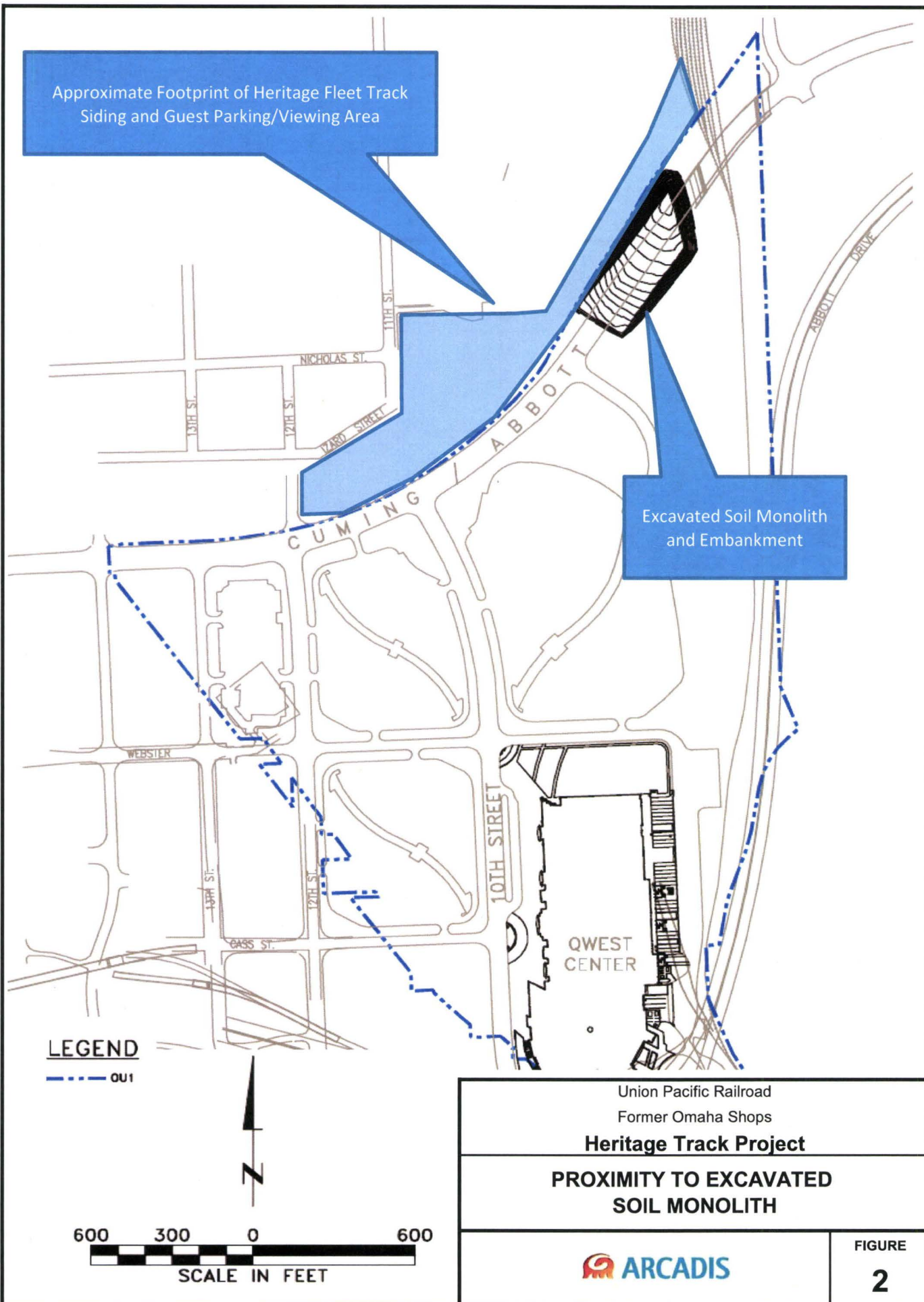

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Senior Engineer

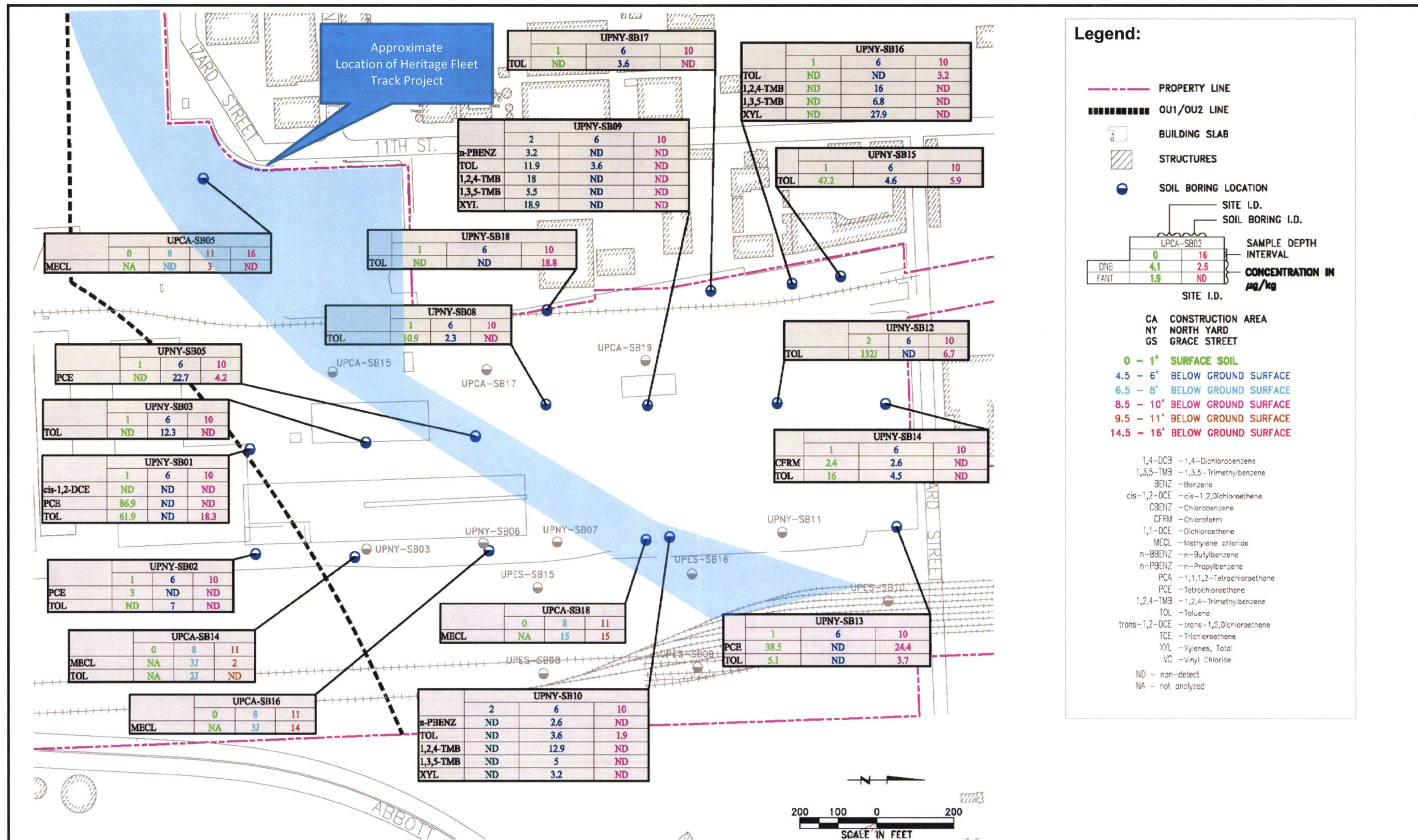

John P. Shonfelt
Senior Project Manager

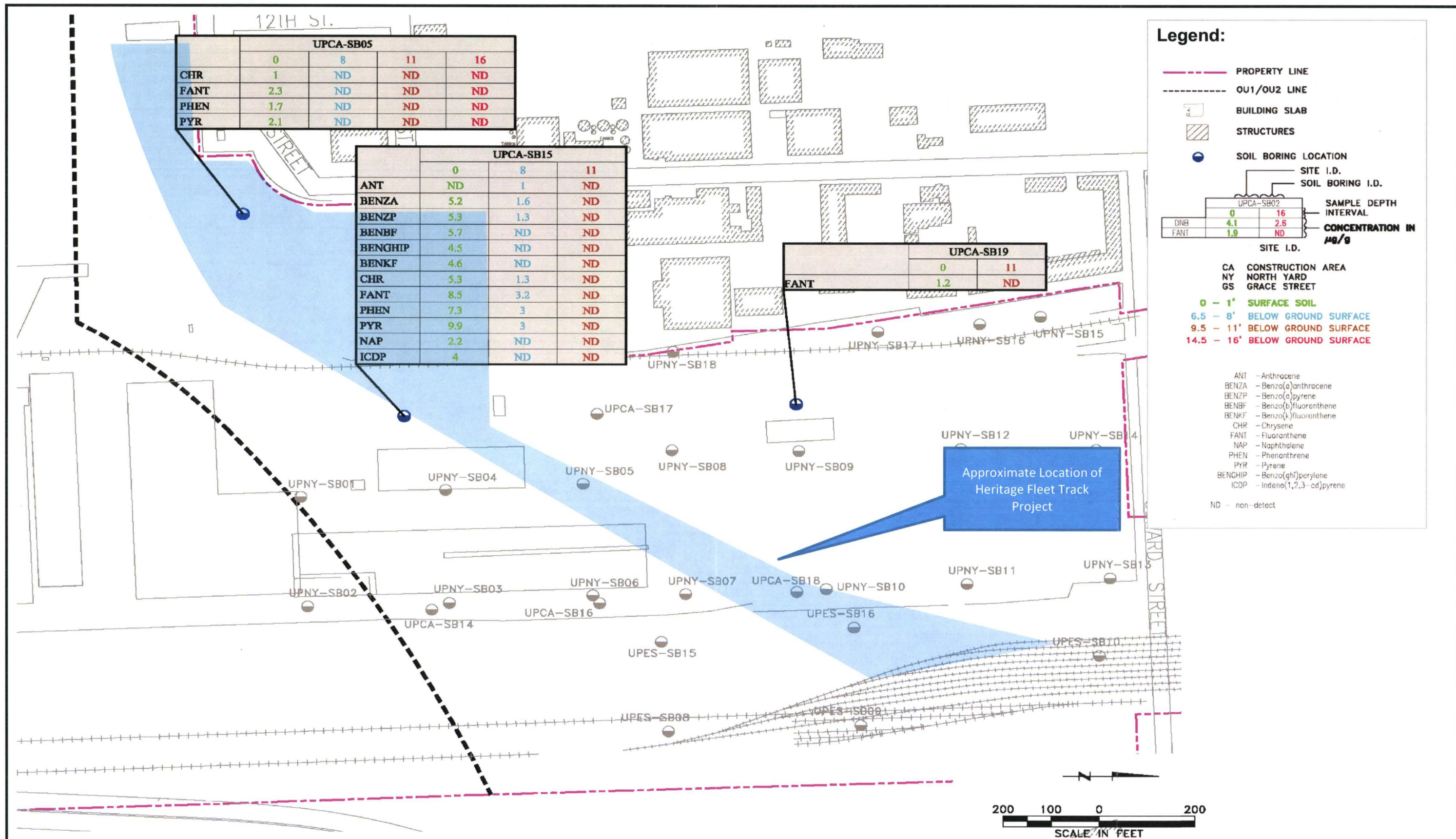
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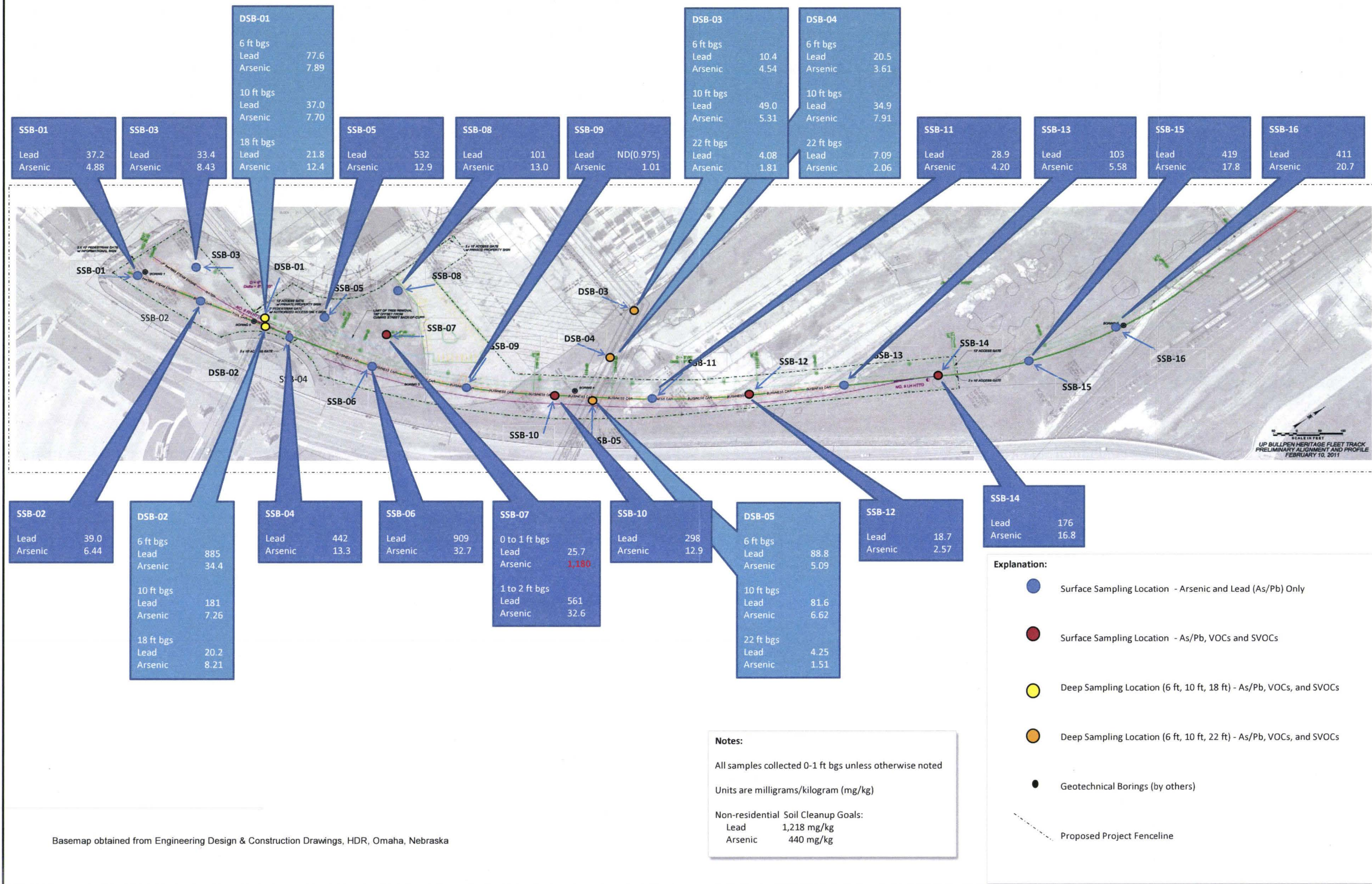
Jeff McDermott (UPRR)
Bill Gidley (NDEQ)
Bob Stubbe (City of Omaha Public Works)
Jeff Smith (URS)







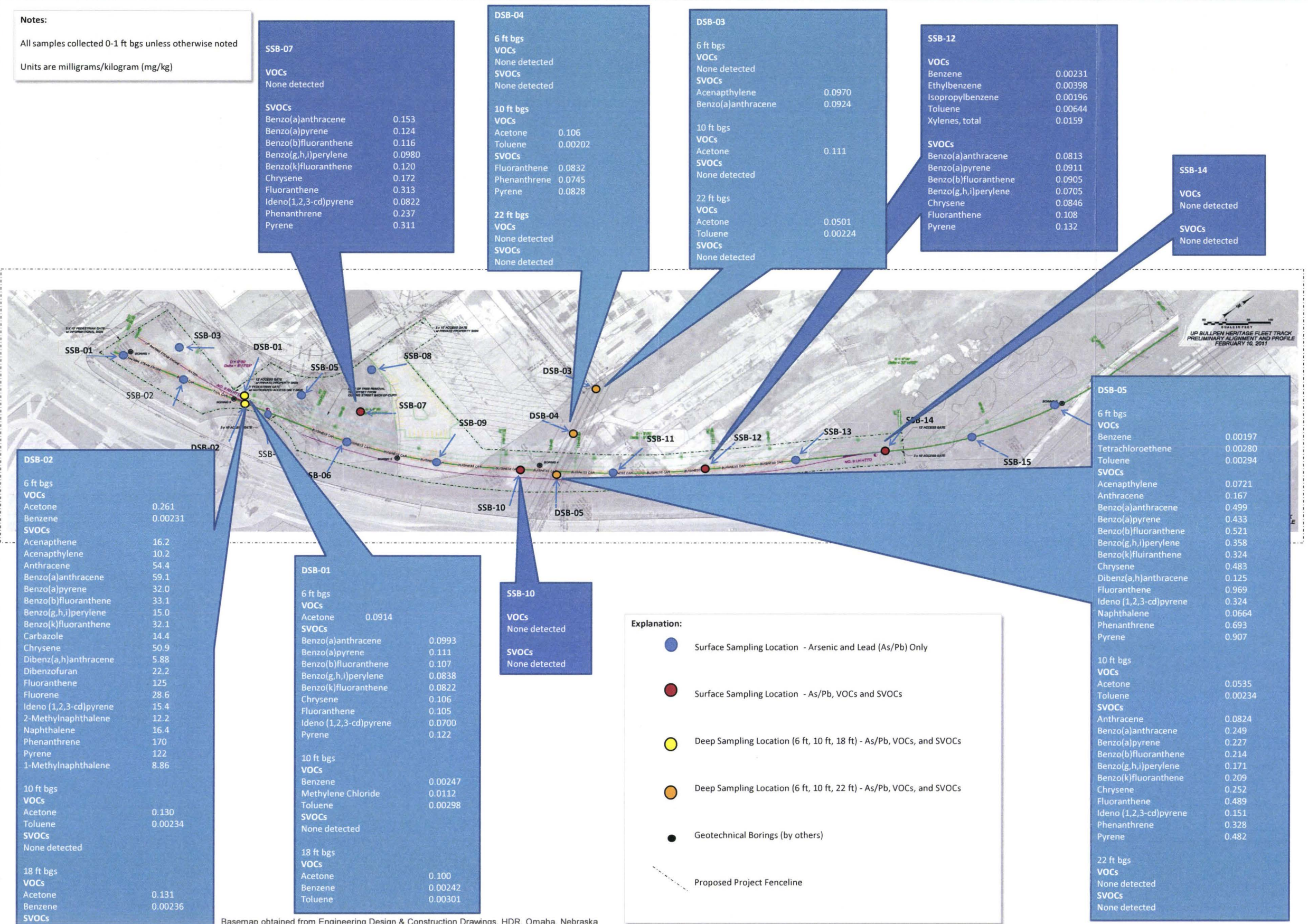




Notes:

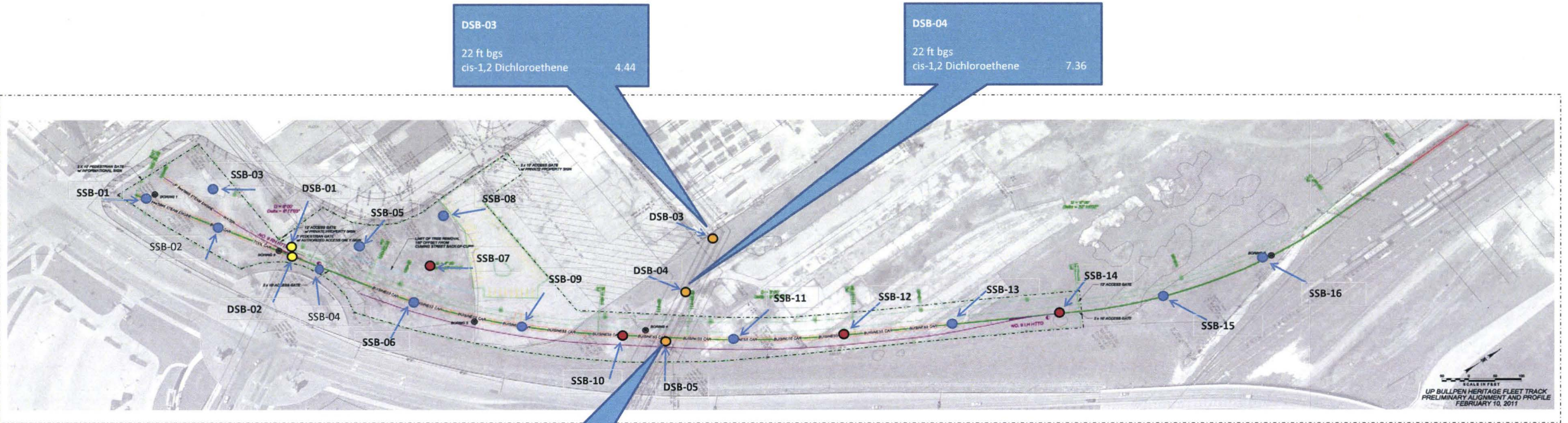
All samples collected 0-1 ft bgs unless otherwise noted

Units are milligrams/kilogram (mg/kg)

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ANALYTICAL RESULTS - VOCs and SVOCs

Heritage Track Project - Former Omaha Shops
Omaha, NebraskaFigure
7



Notes:

Sample depth is 22 ft bgs for all groundwater samples

Only detected constituents are presented

Units are micrograms/liter (ug/L)

Cleanup Goal for Groundwater (non-residential exposure, vapor intrusion pathway):
cis-1,2 Dichloroethene 5,694 ug/L

- Explanation:**
- Surface Sampling Location - Arsenic and Lead (As/Pb) Only
 - Surface Sampling Location - As/Pb, VOCs and SVOCs
 - Deep Sampling Location (6 ft, 10 ft, 18 ft) - As/Pb, VOCs, and SVOCs (no groundwater encountered at 18 ft)
 - Deep Sampling Location (6 ft, 10 ft, 22 ft) - As/Pb, VOCs, and SVOCs (groundwater sample collected at 22 ft)
 - Geotechnical Borings (by others)
 - Proposed Project Fence line

Basemap obtained from Engineering Design & Construction Drawings, HDR, Omaha, Nebraska

Project Manager:
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Drawn by:
BCO

Date:
April 22, 2011

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ANALYTICAL RESULTS - GROUNDWATER VOCs

Heritage Track Project - Former Omaha Shops
Omaha, Nebraska

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